

FILED

SEP 17 2019

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY NY DEPUTY CLERK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA,

v.

BRANDI CAMPBELL.

No. **A19CR 213RP**
INDICTMENT

[Counts One and Two: Felon in Possession of a Firearm, 18 U.S.C. § 922(g); Counts Three and Four: Felon in Possession of Ammunition, 18 U.S.C. § 922(g); Count Five: Possession of Stolen Firearms, 18 U.S.C. § 922(j); Count Six: Possession of Unregistered Firearm, 26 U.S.C. § 5861(d).

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 922(g)(1)]

On or about June 15, 2018, in the Western District of Texas, defendant,

knowing [REDACTED] had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed the following firearms, to wit:

1. Ruger, Model SR40, .40 caliber pistol, Obliterated Serial Number;
2. Sig-Sauer, Model P238, .380 caliber pistol, Serial Number 27A139929;
3. Glock, Model 42, .380 caliber pistol, Serial Number AASV648;
4. Remington, Model 700, .270 caliber rifle, Serial Number S6587950;
5. Savage, 820B, 12-gauge shotgun, No Serial Number;

all of which had traveled in and affected interstate and foreign commerce, in violation of 18 U.S.C. § 922(g)(1).

COUNT TWO
[18 U.S.C. § 922(g)(1)]

On or about June 15, 2018, in the Western District of Texas, defendant,

BRANDI CAMPBELL,

knowing she had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed the following firearms, to wit:

1. Ruger, Model SR40, .40 caliber pistol, Obliterated Serial Number;
2. Sig-Sauer, Model P238, .380 caliber pistol, Serial Number 27A139929;
3. Glock, Model 42, .380 caliber pistol, Serial Number AASV648;
4. Remington, Model 700, .270 caliber rifle, Serial Number S6587950;
5. Savage, Model 820B, 12-gauge shotgun, No Serial Number;

all of which had traveled in and affected interstate and foreign commerce, in violation of 18 U.S.C. § 922(g)(1).

COUNT THREE
[18 U.S.C. § 922(g)]

On or about June 15, 2018, in the Western District of Texas, defendant,

[REDACTED]

knowing [REDACTED] had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed the following ammunition, described by manufacturer, caliber, and quantity:

1. HORNADY	12-gauge	3
2. MONARCH	12-gauge	4
3. AGUILA	12-gauge	20
4. WINCHESTER	40	21
5. FEDERAL	38 SPL+ P	7
6. WINCHESTER	38 SPL+ P	1
7. FEDERAL	38 SPL+ P	15
8. WINCHESTER	38 SPL+ P	5

9. FIOCCHI	380	34
10. JAGEMANN	380	6
11. HORNADY	270	14
12. HORNADY	270	5
13. FIOCCHI	380	3
14. JAGEMANN	380	3
15. WINCHESTER	40	6
16. HORNADY	40	10
17. FEDERAL	380	2
18. SELLIER & BELLOT	380	2
19. CBC	380	1
20. REMINGTON	380	1
21. PPU	380	3
22. FEDERAL	38 SPL+ P	6
23. JAGEMANN	380	4
24. HORNADY	380	3
25. FIOCCHI	380	9
26. MONARCH	12-gauge	5
27. PPU	380	2
28. WINCHESTER	380	8
29. FEDERAL	380	3
30. CBC	380	2
31. PERFECTA	380	1
32. S & B	380	5
33. RWS	380	1
34. PMC	380	4
35. REMINGTON	380	2
36. GFL	380	1
37. BLAZER	380	1
38. DRT	380	1

all of which had traveled in and affected interstate and foreign commerce, in violation of 18 U.S.C.

§ 922(g)(1).

COUNT FOUR
[18 U.S.C. § 922(g)]

On or about June 15, 2018, in the Western District of Texas, defendant,

BRANDI CAMPBELL,

knowing she had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed the following ammunition, described by manufacturer, caliber, and quantity:

1. HORNADY	12-gauge	3
2. MONARCH	12-gauge	4
3. AGUILA	12-gauge	20
4. WINCHESTER	40	21
5. FEDERAL	38 SPL+ P	7
6. WINCHESTER	38 SPL+ P	1
7. FEDERAL	38 SPL+ P	15
8. WINCHESTER	38 SPL+ P	5
9. FIOCCHI	380	34
10. JAGEMANN	380	6
11. HORNADY	270	14
12. HORNADY	270	5
13. FIOCCHI	380	3
14. JAGEMANN	380	3
15. WINCHESTER	40	6
16. HORNADY	40	10
17. FEDERAL	380	2
18. SELLIER & BELLOT	380	2
19. CBC	380	1
20. REMINGTON	380	1
21. PPU	380	3
22. FEDERAL	38 SPL+ P	6
23. JAGEMANN	380	4
24. HORNADY	380	3
25. FIOCCHI	380	9
26. MONARCH	12-gauge	5
27. PPU	380	2
28. WINCHESTER	380	8
29. FEDERAL	380	3
30. CBC	380	2
31. PERFECTA	380	1
32. S & B	380	5
33. RWS	380	1

34. PMC	380	4
35. REMINGTON	380	2
36. GFL	380	1
37. BLAZER	380	1
38. DRT	380	1

all of which had traveled in and affected interstate and foreign commerce, in violation of 18 U.S.C. § 922(g)(1).

COUNT FIVE
[18 U.S.C. § 922(j)]

On or about June 15, 2018, in the Western District of Texas, defendants,

[REDACTED]

BRANDI CAMPBELL,

knowingly possessed and stored stolen firearms, to wit:

1. Remington, Model 700, .270 caliber rifle, Serial Number S6587950;
2. Savage, Model 820B, 12-gauge shotgun, No Serial Number;

all of which had been shipped and transported in interstate and foreign commerce, before or after being stolen, and the defendants knew and had reasonable cause to believe that the firearms were stolen, all in violation of 18 U.S.C. § 922(j).

COUNT SIX
[26 U.S.C. § 5861(d)]

On or about June 15, 2018, in the Western District of Texas, defendant,

[REDACTED]

knowingly possessed a firearm, to wit: Savage, Model 820B, 12-gauge shotgun, No Serial Number, which had a barrel of less than 18 inches in length and the defendant knew the shotgun had a barrel of less than 18 inches in length. The firearm was in operating condition and was not registered to the defendant in the National Firearms Registration and Transfer Record, in violation of 26 U.S.C. § 5861(d).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE

As a result of the foregoing criminal violation, the United States give notices that it intends to forfeit, but is not limited to, the below-described property from Defendants [REDACTED] and Brandi Campbell. Defendants shall forfeit all right, title and interest in the below-described property to the United States pursuant to FED. R. CRIM. P. 32.2 and 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by 28 U.S.C. § 2461(c). Section 924 specifically provides, in pertinent part, the following:

Title 18 U.S.C. § 924.

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of . . . section 922, or . . . knowing violation of section 924, . . . shall be subject to seizure and forfeiture. . . .

This Notice of Demand for Forfeiture includes, but is not limited to, the following firearms:

1. Ruger, Model SR40, .40 caliber pistol, Obliterated Serial Number;
2. Sig-Sauer, Model P238, .380 caliber pistol, Serial Number 27A139929;
3. Glock, Model 42, .380 caliber pistol, Serial Number AASV648;
4. Remington, Model 700, .270 caliber rifle, Serial Number S6587950; and

5. Savage, Model 820B, 12-gauge shotgun, No Serial Number.

This Notice of Demand for Forfeiture also includes, but is not limited to, the following

ammunition:

1. HORNADY	12-gauge	3
2. MONARCH	12-gauge	4
3. AGUILA	12-gauge	20
4. WINCHESTER	40	21
5. FEDERAL	38 SPL+ P	7
6. WINCHESTER	38 SPL+ P	1
7. FEDERAL	38 SPL+ P	15
8. WINCHESTER	38 SPL+ P	5
9. FIOCCHI	380	34
10. JAGEMANN	380	6
11. HORNADY	270	14
12. HORNADY	270	5
13. FIOCCHI	380	3
14. JAGEMANN	380	3
15. WINCHESTER	40	6
16. HORNADY	40	10
17. FEDERAL	380	2
18. SELLIER & BELLOT	380	2
19. CBC	380	1
20. REMINGTON	380	1
21. PPU	380	3
22. FEDERAL	38 SPL+ P	6
23. JAGEMANN	380	4
24. HORNADY	380	3
25. FIOCCHI	380	9
26. MONARCH	12-gauge	5
27. PPU	380	2
28. WINCHESTER	380	8
29. FEDERAL	380	3
30. CBC	380	2
31. PERFECTA	380	1
32. S & B	380	5
33. RWS	380	1
34. PMC	380	4
35. REMINGTON	380	2
36. GFL	380	1
37. BLAZER	380	1
38. DRT	380	1

This Notice of Demand for Forfeiture further includes, but is not limited to, any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offense.

ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

JOHN F. BASH
UNITED STATES ATTORNEY

BY: Sharon S. Pierce
SHARON S. PIERCE
Assistant United States Attorney